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Regarding GN Docket №25–133

Amateur Radio, regulated under 47 CFR Part 97, has been an essential part of emergency response in many public-private partnerships. It has been effective both on an ad-hoc basis and as part of ongoing relationships with emergency communications staff in government, including CERT (Community Emergency Response Teams), AuxComm (Auxiliary Communications), and NOAA's SKYWARN. These public-private partnerships have been a cost-effective way to enable grass-roots community-based lifesaving service.

Ham radio has been a proving ground for many technologies that have benefited everyone widely. For example, both wired and wireless networking were substantially advanced by experimentation within Amateur Radio.

The regulations granting access to certain frequencies and ensuring that licensed Amateur Radio operators are sufficiently knowledgeable in their use have preserved those benefits. While some regulations of Amateur Radio might reasonably be relaxed, the overall structure of the regulation has preserved the value of Amateur Radio not merely to licensed Amateur Radio amateurs, but to those who serve them.

One regulation that is currently limiting Amateur Radio's effectiveness driving technology forward are the arbitrary symbol rate limits expressed in 47 CFR 97.307(f). Removing symbol rate limits in favor of bandwidth limits would preserve all the benefits of the regulation, while also newly encouraging innovation in symbol coding. Because all such coding must be described publicly this will necessarily benefit technology, wired and wireless, outside of Amateur Radio.

Additionally, clarifying the 47 CFR 97.113(a)(4) restrictions do not apply to using encryption solely for the purpose of authentication would enable more effective use of Amateur Radio for emergency communications, such as with AREDN (Amateur Radio Emergency Data Network) operations.

Thank you for your consideration of these matters.